

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

MARCELIN LIBERAL, individually,
and on behalf of all others similarly
situated,

Plaintiff,

v.

HEALTHCARE REVENUE
RECOVERY GROUP, LLC, and
MEMORIAL REGIONAL HOSPITAL
SOUTH AUXILIARY, INC.,

Defendant.

Case No. 0:22-cv-60450-RS

**JOINT STIPULATION OF DISMISSAL WITH PREJUDICE AS TO
PLAINTIFF'S CLAIMS AGAINST HEALTHCARE REVENUE RECOVERY
GROUP, LLC, AND DISMISSAL WITHOUT PREJUDICE AS TO ANY
CLAIMS FOR PROSPECTIVE CLASS MEMBERS**

Plaintiff, MARCELIN LIBERAL, and Defendant, HEALTHCARE REVENUE RECOVERY GROUP, LLC, by and through their undersigned counsel, and pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) hereby stipulate to a dismissal with prejudice as to Plaintiff's claims against Healthcare Revenue Recovery Group, LLC. The parties further stipulate to the dismissal without prejudice as to any claims for prospective class members pursuant to Fed. R. Civ. P. 23(e). Each party to bear its own attorney's fees and costs.

Dated: March 24, 2023

MARCELIN LIBERAL

/s/ Alexander J. Taylor

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Respectfully Submitted,

HEALTHCARE REVENUE
RECOVERY GROUP, LLC

/s/ Ernest H. Kohlmyer

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*Counsel for Defendant, Healthcare Revenue
Recovery Group, LLC*

CERTIFICATE OF SERVICE

I hereby certify that I today, March 24, 2023, caused a copy of the foregoing document to be electronically filed with the Clerk of Court using the CM/ECF system which will be sent to all attorneys of record.

/s/ Alexander J. Taylor